United States Environmental Protection Agency
Region 1
RCRA Inspection Report

Date: June 7, 2010

From: , Environmental Engineer
RCRA, EPCRA and Federal Programs Unit

Thru: Lisa Papetti, Senior Enforcement Coordinator
RCRA, EPCRA and Federal Programs Unit

To: RCRA Enforcement File

Subj: RCRA Compliance Evaluation Inspection of ENPRO Services of Maine, Inc., South Portland, Maine

I. GENERAL INFORMATION

A. Facility Name:
ENPRO Services of Maine, Inc.
106 Main Street
South Portland, ME 04106

B. Responsible Official:
Mr. Peter Grenier, Facility Manager
ENPRO Services of Maine, Inc.
106 Main Street
South Portland, ME 04106
(207) 799-0850

C. Date of Inspection:
May 24-26, 2010

D. Purpose of Inspection:
RCRA Compliance Evaluation Inspection (CEI)

E. Persons Participated in the Inspection:
Richard Hull, Drew Meyer, Donald MacLeod, USEPA Region 1 Office of Environmental Stewardship, RCRA, EPCRA and Federal Programs Unit

Lisa Thuot, Jerry Keefe, Dan Granz, USEPA Region 1 Office of Environmental Measurement & Evaluation

Robert Morrell, Thuan Tran, USEPA Region 2

Dave Dugan, James Mercier, Lorna Goodnight, USEPA National Enforcement Investigations Center

Peter Grenier, Facility Manager, ENPRO Services of Maine, Inc.
Leslie Arnson, Compliance Coordinator, ENPRO Services of Maine, Inc.
Anne McNeil, Compliance Officer, ENPRO Services, Inc.
David Cowie, Chief Operating Officer, ENPRO Services, Inc.
Geoffrey Brown, Technical Services Division Manager, ENPRO Services, Inc.

II. RCRA Reporting/Information Requirements

A. Facility Identification Number:
MED019051069

B. Type of Operation:
Treatment, Storage & Disposal Facility (TSDF) and Large Quantity Generator (LQG)

C. Date of Notification of Hazardous Waste Activity:

III. General Facility Description

ENPRO Services of Maine, Inc. (EMI) operates a licensed TSDF (the "Facility") in South Portland, Maine. The Facility includes three interconnected buildings and is situated on approximately ( ) acres of land. The Facility is bordered by Billy Varhon Drive to the north, Main Street to the west, Carver Boulevard to the east, and residential properties to the south. There are other commercial and industrial operations located in the vicinity of EMI, including a gasoline and oil bulk terminal. EMI operates two overlapping shifts and employs ( ) people. The Facility includes four hazardous waste treatment and storage tanks, rolloff storage containers, ten-day transfer storage cells, 180-day storage cells, trailers, offices and a wastewater treatment system. EMI's water is supplied by the City of South Portland and it discharges municipal sewage, as well as the wastewater generated from its own industrial treatment system, to the City of South Portland sewer system.

EMI is a subsidiary of ENPRO Services, Inc. (ENPRO) which owns and operates another TSDF in Williston, Vermont, as well as remediation services facilities in Pembroke, New Hampshire, Portland, Maine, and Newburyport, Massachusetts (corporate headquarters). ENPRO is a privately held company and has been in operation since 1983.

EMI is licensed by the State of Maine Department of Environmental Protection (MEDEP) for the transfer, storage and treatment of hazardous and non-hazardous wastes. EMI's primary operations include the treatment of waste oil and gasoline

for marketing. EMI is also licensed for the 10-day storage of hazardous waste prior to shipment to a disposal facility and the storage and bulking of hazardous and non-hazardous waste in drums, totes and rolloff containers. EMI's licenses are described in more detail below.

Sampling of hazardous and non-hazardous containers and tanks was conducted during this inspection. The samples were analyzed for total and TCLP metals, pH, flash point and volatile organic compounds. Air monitoring of tanks containing non-hazardous waste oil as well as hazardous waste gasoline was conducted to determine compliance with any applicable RCRA air emission standards. Sampling was conducted by EPA Region I, Region II and NEIC employees. Sample analysis was conducted by EPA Region I's Office of Environmental Measurement & Evaluation (flash point and pH) and under contract by Alpha Analytical Laboratories. A report describing the sampling and including the results is included as Attachment 1 **(located in Q:share\rhull)** to this report.

The inspectors were in the presence of EMI and ENPRO personnel at all times during the inspection. Photos were taken and samples were collected during the inspection.

IV. Recent Inspection and Enforcement History

MEDEP CEI February 4, 2006
MEDEP NOV June 2, 2006
MEDEP Administrative Consent Agreement January 26, 2007 ($7,500 penalty)
MEDEP CEI June 30, 2008
MEDEP NOV August 27, 2008
MEDEP Consent Agreement March 23, 2009 ($8,000 penalty)
□EDEP CEI March 11, 2010

V. Licenses and Permits

A. Licenses and Permits

1. Ten-day transfer license #O-00017-HR-K-N issued April 25, 2008
   - Adds additional ten-day storage capacity to facility
   - Storage of up to 96 55-gallon containers in two trailers for a total of 5,280 gallons per trailer (192 55-gallon containers, 10,560 gallons total)

2. Facility license #O-00017-H1-J-R, #O-00017-HR-J-R and #O-00017-97-G-R Issued May 20, 2004
   - Ten-day storage of up to 40 55-gallon containers in 4 cells
   - Storage allowed for solid and aqueous corrosives & metals, solid and aqueous ignitables and toxics, and ignitable fuels and F-listed wastes
   - approved for D001, D002, D003, D018, F001, F002, F003, F004, F005, F006, U184, lab packs and household HW (D001, D002, D007, D008, D009 (mercuric nitrate solution), D011, F003)

Container Storage Area:

- 180-day storage of 112 55-gallon containers of hazardous and non-hazardous material, including waste oil and metals containing hazardous waste (solids and wastewater)
- segregation of non-hazardous and hazardous waste required
- hazardous waste screened by waste profile and manifest review
- solids may consist of sand blast grit, sediment/soil, filter media and absorbents
- solids may be consolidated to rolloff containers
- approved for D004 – D008, D010, D011
- storage of mercury and mercury-containing waste is prohibited
- waste oil containers stored until transfer to transport vehicles or waste oil tanks

Tanks:

- 4 tanks
- 6,000 gal. hazardous waste fuel (T4) tank for treatment and storage prior to transfer offsite for ultimate disposal or reuse
- waste gasoline/fuel screened for PCBs, total halogens and flash point
- three 15,000-gal. waste oil (T1, T2, T3) tanks for treatment and storage prior to transfer offsite for further treatment or reuse as fuel supplement
- waste oil screened for PCBs, total halogens and flash point

Rolloff Containers and Box Trailers:

- 4 rolloff containers and 2 box trailers for oily debris, material and sludge, limited to 24 cubic yards each (all solids)
- no waste oil or hazardous waste storage

Total facility capacity:

- 45,000 gal. waste oil in tanks
- total hazardous waste storage of 8,860 gal.
- 6,000 gal. waste gasoline
- up to 52 55-gal. (2,860 gal.) hazardous waste in 10-day transfer and container storage areas

VI. Physical Inspection

A CEI, including sampling, was conducted at EMI on May 24, 25 and 26. The following describes the observations made during the physical inspection:

A. Ten-Day Transfer Storage Area

EMI manages a hazardous waste container storage area within the main building at the Facility, located adjacent to the wastewater treatment area and tanks. The

container storage area is segregated by concrete berms and is equipped with sprinklers. A further description of the construction of the storage area and the individual cells is provided in the license. The area consists of three cells for the storage of hazardous waste for up to ten days prior to offsite transfer, as well as one cell for the storage of ignitable hazardous waste gasoline for up to 180 days prior to transfer to hazardous waste Tank 4 for treatment and storage. Cells A and B are licensed for the storage of corrosive waste, cell C for ignitable and toxic waste and cell D for 180 day ignitable storage. The table below details the containers in storage at the time of the inspection.

Table 1 – Ten-Day Transfer Storage Cells

Cell	Container	Label	Waste Profile	Date
A	Two 5-gal. buckets batteries			
A	Two CTUs			
A	Computer			
A	Two boxes mercury containing lamps			
B	5-gal. bucket	Hazardous waste solid, silver, D011		
B	30-gal. drum	Hazardous waste solid, silver D011		
C	4 55-gal. drums[1]	Hazardous waste gasoline, D001, D018; dated 5/21/10[2]		
C		Drew's notes		
D	9 55-gal. drums	Hazardous waste gasoline, D001, D018; various dates[3]		

Other than the 180-day gasoline storage containers, none of the containers stored in the 10-day transfer cells included unique tracking labels or dates to identify when the container entered the storage area. The containers were only labeled with the original generator label and date. EMI personnel indicated that a master

[1] Four 55-gallon drums of waste gasoline to be transferred to Tank 4 were being stored in Cell C at the time of the inspection. The four drums were overflow from Cell D which was at storage capacity. This overflow storage is allowed by the license, as long as overflow storage does not exceed 10 days.

[2] Waste gasoline containers are labeled with dates to track 180 day storage. The overflow containers included pink date labels.

[3] All drums included green date labels for tracking 180 day storage. The oldest date for the drums in Cell D was April 15, 2010.

log book is kept that tracks all container information including date of acceptance. Manifests for all 10-day transfer containers, including those stored in the trailers, are maintained at the 10-day storage cells. EMI also maintains an electronic inventory of containers in storage. A review of the inventory report for the day of the inspection showed that the only information that is contained in the inventory is the number and size of containers in each area and the date of the oldest container in storage (Attachment 2). EMI personnel indicated that between the log book, the inventory and the manifests, all containers are accounted for and can be located at any time. Inspectors were able to identify container location and storage time using this documentation. But, the process was cumbersome as all the required information to properly locate a container and identify the amount of time in storage was located in different docements at different locations. Inspectors suggest that EMI adopt an electronic container tracking system. EMI personnel indicated that an electronic system is used at the ENPRO facility in Vermont and that a similar system was under development for EMI.

During its ( ) inspection, MEDEP identified EMI's failure to label containers in storage with the date of arrival as an issue. Following the inspection, EPA contacted MEDEP to determine its position regarding the labeling of containers in storage with the date of arrival. MEDEP personnel indicated that they may include specific language in the next license reissuance that would require EMI to label each container in storage with the date of arrival.

B. Container Storage Area

EMI operates a container storage area in the main building for the storage of hazardous and non-hazardous waste containers of various sizes. At the time of the inspection, 30-gallon, 55-gallon and 330-gallon containers were being stored. The area is licensed for the consolidation and storage of hazardous and non-hazardous waste for up to 180 days, including waste codes D004 – D008, D010, D011. EMI's license also allows for the consolidation of solid waste from containers in this area to rolloff containers outside of the building.

At the time of the inspection, EMI indicated that it was only storing non-hazardous waste within this area. EMI personnel indicated that since the opening of ENPRO's Vermont facility, most hazardous waste that would have previously been delivered and stored in this area is now routed directly to Vermont. Inspection of the area showed all containers in storage to be labeled as non-hazardous waste. Similar to the 10-day transfer area, none of the containers in this area were labeled with arrival dates. A number of these non-hazardous waste containers were selected and marked for sampling to confirm labeling and waste profiling.

C. 10-Day Storage in Trailers

As indicated above, EMI was issued a license for the 10-day storage of hazardous waste in two trailers prior to transfer off-site for ultimate disposal. At the time of the inspection, EMI was maintaining storage in two trailers. One trailer was

located at a northeast side of the building at the loading dock to the main building and the second trailer was located at a loading dock at the rear of the facility, immediately adjacent to the building. Attachment 3 is a site plan identifying the trailers and rolloff containers being maintained at the Facility at the time of the inspection. Trailer #2, as designated by EMI's electronic inventory, was located at the loading dock to the main building, in the tank off-loading area. At the time of the inspection, trailer #2 was storing 29 55-gallon drums and one 30-gallon drum of flammable solids. None of these containers were identified for sampling as the EPA sampling team was not equipped to sample flammable solids.

The second storage trailer (Trailer #1) was located at the loading dock at the rear of the facility. At the time of the inspection, there were a total of 26 55-gallon drums, 4 30-gallon drums and 3 cubic yard totes stored in trailer #1. Eight containers were identified for sampling from trailer #1. Both storage trailers were locked and were equipped with containment added to the base and sides of the trailer bodies, as well as the containers being stored on containment pallets.

D. Rolloff-Container Storage

At the time of the inspection, EMI was storing waste in seven rolloff-containers at the facility. All of the containers were designated by EMI as non-hazardous waste. Six of the containers were located at the rear of the facility in the yard and at the rear loading dock, while one container was located at the northeast side of the building at the loading dock area adjacent to the tanks. All of the rolloff containers were covered at the time of the inspection. Four of the six rollloff containers were sampled. EMI provided copies of the manifests of the material that was stored in each rolloff at the time that it was sampled (Attachment 4).

E. Tank Storage

1. EMI treats and stores non-hazardous waste oil in three 15,000 gallon vertical steel tanks at the facility. At the time of the inspection, tank #2 was empty and being serviced. Treatment in the tanks consists of heating and separation. Heating is provided by circulating hot water through pipes within the tanks. At the time of the inspection, tanks #1 and #3 were approximately 70% full, according to the level indicators. Servicing of tank #2 consisted of draining waste oil and shipping offsite and collecting any remaining solids. At the time of the inspection, the solids that had been removed from tank #2 were being stored in 330-gallon totes in the tank off-loading area. One of the totes was sampled as part of the inspection.

2. Hazardous waste gasoline is also treated and stored at the facility in a 6,000 gallon tank. Material is delivered by bulk tank-truck or in 55-gallon containers that are stored and then added to the tank. The tank is a horizontal tank that is enclosed

F. Air Emission Monitoring from Tanks

Bill Osbahr and Mike Mooney conducted air monitoring to detect emissions from the EMI tanks. Monitoring was conducted at all possible emission pathways at the tops of each tank as well as at associated equipment and piping. The monitoring results will be compared against applicable RCRA air emission requirements contained in Subparts AA, BB and CC. Prior to conducting the monitoring using a photo-ionization detector (PID), the equipment was calibrated and tested. The equipment was recalibrated and tested following the conclusion of the monitoring. A description of the devices that were monitored, along with the monitoring results, is included in Attachment 5 **(located in Q:share\rhull)**. Along with the monitoring results, inspectors collected manifests for all materials that were stored in tanks #1, #3 and #4 at the time of monitoring (Attachment 6).

G. Tank and Container Sampling

Sampling of material in tanks and containers was conducted as part of the inspection. A sampling team comprised of EPA personnel from Regions 1 and 2 and NEIC collected samples from tanks and containers during the inspection. Samples were collected from tanks #1, #3 and #4 as well as from select rolloff containers, drums and totes stored onsite at the time of the inspection. Tank #2 was empty and being serviced at the time of the inspection and was not sampled. As indicated above, manifests were provided for all the material stored in the tanks at the time of the inspection.

Containers were selected for sampling based on inspector knowledge of constituents that could possibly be included in certain hazardous and non-hazardous waste versus how the material in containers were actually characterized and labeled. Attachment 7 includes manifests and waste profiles for the waste being stored in the containers that were sampled at the time of the inspection. For example, EMI was storing multiple 330-gallon totes of waste paint and inks as non-hazardous. Inspectors identified these containers for sampling based on experience that these types of materials can contain volatile compounds and metals. Detailed below are the containers and rolloffs that were selected for sampling:

Table 2 – Containers Selected for Sampling

Sample #	Location	Description	Generator/Waste Profile
EPA01	10-day storage trailer #1	55-gal. container paint related material, D001, F003	MEDOT SEDGWICK-003
EPA02	10-day storage trailer #1	55-gal. container oily waste, VT02, MA01	Trelleborg Offshore TRELL/MANSFIELD-001

Sample #	Location	Description	Generator/Waste Profile
EPA03	10-day storage trailer #1	55-gal. non-hazardous pentane/water	Trelleborg Offshore No WP
EPA04	10-day storage trailer #1	55-gal. waste caustic alkali liquid	Thermal Circuits Thermal-008
EPA05[4]	10-day storage trailer #1	55-gal. non-hazardous reacted part A&B solids	Trelleborg 001036827GBF
EPA06	10-day storage trailer #1	55-gal. waste paint, F003, F005, D035	Lyman Morse Boat LYMAN-007
EPA07	10-day storage trailer #1	Waste paint, D001, F003	Eastern Aroostook RSU#39 No WP
EPA08	10-day storage trailer #1	Non-hazardous gasoline mixture	Sunoco No WP
EPA09	180-day storage room	330-gal. non-hazardous latex paint	Quality Wood NHZ00116525
EPA10	180-day storage room	55-gal. wastewater sludge	Acme Printing Co. NHZ00110672
EPA11	180-day storage room	55-gal. non-hazardous aqueous coating	Acme Printing Co. NHZ00116582
EPA12	180-day storage room	55-gal. non-regulated ink	JS McCarthy Printers NHZ00122147
EPA13	180-day storage room	55-gal. non-hazardous adhesive	Geiger Inc. NHZ00122178
EPA14	180-day storage room	330-gal. latex paint	Quality Wood NHZ00116421
EPA15	180-day storage room	330-gal.	United No WP

[4] The material in this container was solidified and was not able to be sampled.

Sample #	Location	Description	Generator/Waste Profile
EPA16	180-day storage room	55-gal. develop/solvent solution	Thermal Circuits NHZ00116585
EPA17	Outside @ tank transfer	330-gal. tank #2 non-RCRA, non-DOT tank bottoms	ENPRO No WP
EPA18	180-day storage room	330-gal. non-RCRA, non-DOT antifreeze	ENPRO S-98
EPA19	180-day storage room	330-gal. non-RCRA, non-DOT coolant	ENPRO 3-194
EPA20	180-day storage room	330-gal. non-RCRA, non-DOT oily water	ENPRO No WP
EPA21	180-day storage room	33-gal. oily water	ENPRO 2-122
EPA22	180-day storage room	330-gal. spent coating	Monadnock Paper NHZ00112808
EPA23	10-day transfer cell D	55-gal. gasoline and water, 4/29/10, D001, D018	Southern Maine Mobil SACO 001
EPA24	10-day transfer cell D	55-gal. waste gasoline, 5/10/2010, D001, D018	Boothbay Region Boatyard BoothbayRBY-004
EPA25	10-day transfer cell D	55-gal. waste gasoline	Jeff's Marine Jeffs-002
RO 03	Southern corner of yard	Rolloff container, weld #112079, oily solids, filter cake, oil cans/filters	Thermal Circuits[5]
RO 11	Southern corner of yard, adjacent to RO 03	Rolloff container, weld #309703, cans, ink sludge, metal shavings, sludge cake[6]	

[5] Waste in rolloff containers was normally generated from multiple generators. ENPRO provided copies of manifests for the wastes being stored in each rolloff container at the time that it was sampled. These manifests identify each generator and the specific waste profiles.

[6] At the time of the inspection, Mr. Grenier indicated that this material had been sampled recently and that the results had not yet been received.

Sample #	Location	Description	Generator/Waste Profile
RO 77	Adjacent to concrete pad and rear loading dock	Rolloff container, weld #110479, wastewater filter cake, spent carbon	ENPRO[7]
RO 02	Hazardous waste tanks loading area	Rolloff container, weld #EMI-92-25, oily debris, sludge	

VII. Outbrief

An outbrief was conducted at the conclusion of the inspection. The following people attended the outbrief:

Richard Hull, USEPA
Drew Meyer, USEPA
Don MacLeod, USEPA
Jerry Keefe, USEPA

Mr. Peter Grenier, ENPRO
Ms. Anne McNeil, ENPRO
Mr. David Cowie, ENPRO (via video conference)
Mr. Geoffrey Brown, ENPRO (via video conference)

The following issues were discussed during the outbrief:

- Because the focus of the inspection was sampling, inspectors explained that the samples would need to be analyzed and results reviewed prior to making any compliance determinations relative to waste characterizations.
- Samples were collected from three of the four bulk-storage tanks, from four rolloff containers and from a total of 24 other containers. Samples would be analyzed for metals, pH, flash point and volatile organic compounds. Inspectors indicated that sample results would be expected in about 14 days.
- Inspectors discussed EMI's procedure for tracking containers that had been received and were being stored at the facility. Inspectors noted that similar facilities use an electronic tracking system that allows for the location of containers in storage. As discussed in the report, the tracking of containers via a combination of paper manifests, electronic inventory and a master log is cumbersome.
- EMI representatives were provided with the air monitoring results from the storage tanks. Although no conclusions could be drawn from

[7] Wastewater filter cake and carbon is generated in ENPRO's wastewater treatment facility and is combined with oily debris from other generators within this rolloff container. ENPRO officials indicated that this combined waste is managed as non-hazardous.

the results relative to compliance with any air emission regulations, the results were provided to documents that emissions were detected during the inspection.

- EMI's policy of not dating containers with the date of arrival at the facility was discussed. Inspectors indicated that this issue would be reviewed with the MEDEP, which has identified this as an issue during previous inspections.